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OFFICE OF THE
EXECUTIVE SECRETARY

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ALSO LICENSED IN ALABAMA
+ ALSO LICENSED IN ARIZONA

January 13, 1998

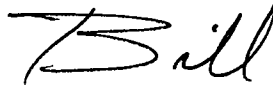
Mr. K. David Waddell
Executive Secretary
Tennessee Regulatory Authority
460 James Robertson Parkway
Nashville, Tennessee 37243-0505

Re: Application of the Electric Power Board of Chattanooga
for a Certificate of Public Convenience and Necessity
to Provide Intrastate Telecommunication Services
Docket No. 97-07488

Dear Mr. Waddell:

We are enclosing an original and 13 copies of the Electric
Power Board Response to American Communication Services, Inc.
Request for Production of Documents.

Sincerely yours,



William C. Carriger
For the Firm

WCC/dh
Enclosure
75741
cc: Parties of Record

BEFORE THE TENNESSEE REGULATORY AUTHORITY
NASHVILLE, TENNESSEE

REC'D TN
REGULATORY AUTH.
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OFFICE OF THE
EXECUTIVE SECRETARY

In Re: :
: :
Application of Electric :
Power Board of Chattanooga :
for a Certificate of :
Public Convenience and :
Necessity to Provide :
Intrastate Telecommunications :
Services :

Docket No. 97-0748

RESPONSE TO REQUEST FOR PRODUCTION OF DOCUMENTS

American Communications Services, Inc. has filed a formal request for production of documents to which the Electric Power Board of Chattanooga responds:

1. Please provide a copy of all current agreements permitting local telephone companies or cable television companies to use utility poles or conduit belonging to the Electric Power Board of Chattanooga.

RESPONSE: The Electric Power Board of Chattanooga will produce at the offices of Strang, Fletcher, Carriger, Walker, Hodge & Smith, PLLC, 400 Krystal Building, One Union Square, Chattanooga, Tennessee 37402, at a time mutually agreed upon, the following agreements with telephone and cable television companies:

1. License Agreement for Pole Attachments dated May 18, 1981 with Clear-Vu Cable, Inc.
2. License Agreement for Pole Attachments dated May 7, 1984 with Clear-Vu Cable, Inc.
3. License Agreement for Pole Attachments dated February 24, 1984 with GeoSat Cable.
4. License Agreement for Pole Attachments dated June 13, 1991 with Telecable of Cleveland, Inc.
5. Permit for Attachments dated July 16, 1981 with Trenton Telephone Company.

6. Agreement dated January 1, 1990 with South Central Bell Telephone Company.
7. Agreement dated January 1, 1990 with Southern Bell Telephone and Telegraph Company.
8. Agreement dated February 22, 1991 with Ooltewah-Collegedale Telephone Company (rates being negotiated).
9. Joint Use Pole Agreement dated January 1, 1992 with Bledsoe Telephone Cooperative and CATV.
10. Joint Use Pole Agreement dated January 1, 1992 with Chickamauga Telephone Company.

There is no current agreement with Comcast Cable, the previous agreement dated February 26, 1973 with LVO Cable of Chattanooga, Inc. having been cancelled and a new agreement is still being negotiated.

The proposed agreement with American Communication Services of Chattanooga, Inc. awaits a certificate of existence and a corrected bond.

Respectfully submitted,

STRANG, FLETCHER, CARRIGER,
WALKER, HODGE & SMITH, PLLC

By: 

Carlos C. Smith
William C. Carriger
Mark W. Smith
Attorneys for Electric Power
Board of Chattanooga
400 Krystal Building
One Union Square
Chattanooga, Tennessee 37402
(423) 265-2000

CERTIFICATE OF SERVICE

I hereby certify that I have this day served a true and exact copy of the within and foregoing pleading on behalf of the Electric Power Board of Chattanooga, via United States mail, first class postage prepared and properly addressed to the following:

Dennis P. McNamee, Esquire
General Counsel
Tennessee Regulatory Authority
460 James Robertson Parkway
Nashville, Tennessee 37243-0505

Guy M. Hicks, General Counsel
BellSouth Communications, Inc.
333 Commerce Street
Suite 2101
Nashville, Tennessee 37201-3300

Val Sanford, Esquire
Gullett, Sanford, Robinson & Martin
P.O. Box 198888
Nashville, Tennessee 37219-8888

James P. Lamoureux, Esquire
AT&T Communications of the South Central States, Inc.
1200 Peachtree Street N.E.
Room 4060
Atlanta, Georgia 30309

Charles B. Welch, Jr., Esquire
Farris, Mathews, Gilman, Branan & Hellen, P.L.C.
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Vance L. Broemel, Esquire
Assistant Attorney General
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105 Malloy Street, Suite 300
Nashville, Tennessee 37201

Michael R. Knauff
Tennessee Power Company
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Chattanooga, Tennessee 37411

Jon E. Hastings, Esquire
Boult, Cummings, Conners & Berry
P. O. Box 198062
Nashville, Tennessee 37219

This 13th day of January, 1998.



Strang, Fletcher, Carriger, Walker
Hodge & Smith, PLLC

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